

IN THE UNITED STATES BANKRUPTCY COURT FOR DISTRICT OF MARYLAND

In RE:
Eric RAYMON MCKEEVER A/K/A
ERIC R. MCKEEVER
Debtor

Case No.: 10-1-3540-NA

CHASE HOME FINANCE, LLC S/BM TO CHASE MANHATTAN MORTGAGE CORP.
Movant

CHAPTER 7

RESPONSE TO

MOTION FOR RELIEF TO STAY

Vs.
Eric RAYMON MCKEEVER A/K/A
ERIC R. MCKEEVER
George W. Liebmann, Trustee
Respondent

I'm writing this letter on March 22, 2010, because I do not want the court to grant the motion for relief from stay for the property at 601 E. 38th Street. When I filed for bankruptcy I didn't include the house in hopes of catching up the mortgage.

I sent Chase Mortgage a check on 2-16-2010 for 1301.65 that was returned because of the amount of money that was owed to them. I was saving money in my checking account to pay chase and my account was frozen. I had two paychecks that went into the account plus a refund check from for my ground rent for the property.

I've enclosed a copy of that letter from when I filed a motion to unfreeze my account. When I went to the DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY (Civil Case #0101-0007105-2009) on 2-19-10 the Judge didn't trial the case, because it was in the hands of the Bankruptcy Court. Since that time I have another \$2000.00 to go with that to help retrieve the property.

A copy will be hand delivered on 3-23-10 to:

Michael T. Cantrell
210 E. Redwood Street
Baltimore, Maryland 21202-3399

I HEREBY CERTIFY THAT A COPY OF THE
MOTION FOR RELIEF FROM STAY WILL BE
HAND DELIVERED ON - 3-23-10.

Thanks,

Eric McKeever

Eric McKeever

FILED
MAR 23 11:11:51
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

COPY ATTACHED

ERIC MC KEEVER

CASE # 0101-0007105-2009

Dear Judge:

When I went to take funds out of my account this past Friday evening I found that my account was frozen from Lendmark Financial Services. I called the number provided by the bank and explained that the money that I had in my account was to pay on my mortgage at the home where I reside.

I asked what did I need to do to unfreeze my account, and I was told that they would get back to me after checking my account. I called throughout the day, and I was told that I had \$3431.28 in the bank, and that they wanted \$3057.61. They sent me a release form with the amount which I'm submitting as exhibit 1. I realize that I have an outstanding debt with them, but I feel what they are asking for is unreasonable. I also feel the reason that they are requesting so much is because I told them in November that I was going to file for Bankruptcy.

The debt is secured by two parties, Jennifer Hayes, and I. Jennifer is still residing at the residence where Lendmark Contractors performed the work, and I was informed by her that they were going to start Garnishment of her wages which I have included as exhibit 2.

I'm asking on leniency from the courts for the following reason;

Hardship- I was making \$25.00 an hour in 09. We lost the contract and I had to take a job for \$10.00 an hour. I'm now at \$17.00, but I'm behind in my mortgage. The only reason the money was in my account was because I needed to send a substantial amount at one time to Chase Mortgage. The outstanding balance is \$9,871.88.

I printed out a copy of my statement to show that the money came from two of my paychecks where I brought home 1814.50, and 1860.04 from working overtime in my security position from the past snow storms. I walked to work without boots, because no busses were running, and I could not afford to miss time. I also made a \$500.00 dollar deposit that I received from my mom from her Social Security Check, and I deposited a 680.00 dollar check Thursday, which was a refund from ground rent. The check was in a pile of bills, and it was dated for 11-11-09. The bulk of the money that came out of my account went to catch up my car payment. 1-27-10 \$900.00 came out to CLUS-OWN, and on 2-12-10 \$600.00 went to my car. I have included a copy of my Escrow Check, Bank Statement, and paychecks with overtime for exhibit 3, and a copy of my mortgage statement exhibit 4.

I spoke with Janet a representative for Lendmark in November and I told her that I was filling for bankruptcy. She asked me for the attorneys name and she also wanted to know if Jennifer was filling. I told her that I didn't know about Jennifer and that I didn't have an attorney name,

because I had gone through Platinum Agency. She told me that they were going to file to garnish our wages.

I'm also asking for leniency because Lendmark knew of my intent to file for bankruptcy that's why they want to keep over three thousand dollars, plus garnish our checks. I'm also trying to save my home.

The process to file for bankruptcy took longer then what I thought, because I didn't have the money. Once I paid Platinum Agency their fee of 300.00 I thought that would be it. I also had to pay 50.00 to Consumer Credit Counseling on 1-19-10, and I just paid the fee of 299.00 to the US Bankruptcy Court. A copy of the certificate is enclosed. Can you please carefully review my case and please show me some compassion. I'm 49 nine years old, and I have never filed for bankruptcy and was also able to manage my bills. I have 5 children two are grown and the others are 17, 14, and 10. I've always taken children, and it was never court ordered.

I would like to thank you in advance for any help that you can provide. Can you please release my account I can bring the court a copy for certified funds for \$3000.00 that I will submit to my mortgage company.

Sincerely,


Eric McKeever